

**Exhibit A**

January 2002 Fee Application

## UNITED STATES BANKRUPTCY COURT

## FOR THE DISTRICT OF DELAWARE

In re:

W.R. GRACE & CO., *et al*

Debtors.

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)  
)

Chapter 11

Case No. 01-01139 (JJF)  
(Jointly Administered)

**SUMMARY COVERSHEET TO TENTH MONTHLY INTERIM APPLICATION OF  
WALLACE KING MARRARO & BRANSON PLLC  
FOR COMPENSATION AND FOR REIMBURSEMENT OF EXPENSES FOR  
JANUARY 1, 2002 THROUGH JANUARY 31, 2002**

Name of Applicant:	Wallace King Marraro & Branson PLLC. ("WKMB")
Authorized to provide professional services to:	Special Litigation and Environmental Counsel to Debtors
Date of Retention:	April 2, 2001
Period for which compensation and reimbursement is sought:	January 1, 2002 through January 31, 2002.
Amount of compensation sought as actual, reasonable and necessary	\$79,379.36 for the period January 1, 2002 through January 31, 2002 (80% of \$99,224.20 after 40% discount for Honeywell matter), in professional fees).
Amount of expense reimbursement sought as actual, reasonable, and necessary:	\$2,260.41 for the period January 1, 2002 through January 31, 2002.

This is a: Monthly interim application.

Prior Applications filed: Yes.

Date Filed	Period Covered	Requested Fees	Requested Expenses	Status of Fees	Status of Expenses
7/5/01	4/2/01 through 4/30/01	\$216,471.50	\$25,282.16	80% Paid	100% Paid
7/5/01	5/1/01 through 5/31/01	\$244,726.00	\$26,594.89	80% Paid	100% Paid
8/9/01	6/1/01 through 6/20/01	\$186,977.91	\$90,104.66	80% Paid	100% Paid
8/28/01	7/1/01 through 7/31/01	\$101,544.08	\$52,387.36	80% Paid	100% Paid
10/18/01	8/1/01 through 8/31/01	\$85,722.80	\$56,387.04	80% Paid	100% Paid
11/05/01	9/1/01 through 9/30/01	\$66,562.16	\$24,668.50	80% Paid	100% Paid
12/13/01	10/1/01 through 10/31/01	\$76,674.32	\$10,019.94	80% Paid	100% Paid
1/02/02	11/1/01 through 11/30/01	\$76,484.30	\$13,513.96	No objections served on Counsel	No objections served on Counsel
2/12/02	12/1/01 through 12/31/01	\$46,954.80	\$17,209.63	No objections served on Counsel	No objections served on Counsel

As indicated above, this is the tenth application for interim compensation of services filed with the Bankruptcy Court in the Chapter 11 Cases

Summary of Compensation Requested

Name of Professional Individual	Position, year assumed, prior relevant experience, year of obtaining relevant license to practice	Hourly Billing Rate (including Changes)	Total Hours Billed	Total Compensation
Christopher Marraro	Partner	\$440	78.8	\$34,672.00
Angela Pelletier	Associate	\$225	74.9	\$16,852.50
William Hughes	Counsel	\$350	151.3	\$52,955.00
Tamara Parker	Associate	\$270	62.8	\$16,956.00
Alec C. Zacaroli	Associate	\$210	4.7	\$987.00
Barbara Banks	Paralegal	\$135	134.7	\$18,184.50
Natasha Bynum	Legal Clerk	\$100	2.5	\$250.00
Mahmoude Moasser	Paralegal	\$135	96.1	\$12,973.50
Reilley L. Smith	Paralegal	\$120	15.2	\$1,824.00
Keith Kaider	Paralegal	\$135	1.5	\$202.50

Total Fees \$155,857.00

Total Hours 622.50

**EXPENSE SUMMARY**

Copies- Internal and Outside		\$1,157.75
Facsimile		\$80.25
Lexis		\$114.18
Telephone		\$324.23
Westlaw		\$264.96
Overtime Transportation		\$319.04
Total		\$2,260.41

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re: ) Chapter 11  
)  
W. R. GRACE & CO., et al.,<sup>1</sup> ) Case No. 01-01139 (JJF)  
) (Jointly Administered)  
)  
Debtors. )

**VERIFIED APPLICATION OF WALLACE KING MARRARO & BRANSON FOR  
COMPENSATION FOR SERVICES AND REIMBURSEMENT OF EXPENSES  
AS SPECIAL COUNSEL TO W. R. GRACE & CO., ET AL., FOR  
THE TENTH INTERIM PERIOD FROM JANUARY 1, 2002 THROUGH  
JANUARY 31, 2002**

Pursuant to sections 327, 330 and 331 of title 11 of the United States Code (as amended, the “Bankruptcy Code”), Fed. R. Bankr. P. 2016, the Retention Order (as defined below), the Administrative Order Under 11 U.S.C. §§ 105(a) and 331 Establishing Procedures for Interim Compensation and Reimbursement of Professionals and Official Committee Members (the “Interim Compensation Order”) and Del.Bankr.LR 2016-2, the law firm of Wallace King Marraro & Branson PLLC (“WKMB”) as special litigation and environmental counsel for the above-captioned debtors and debtors in possession (collectively, “Debtors”) in connection with their chapter 11 cases, hereby

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<sup>1</sup> The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-1 Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food ‘N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, LB Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc.), Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc.), E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

applies for an order allowing it (i) compensation in the amount of \$155,857.00 for the reasonable and necessary legal services WKMB has rendered to the Debtors and (ii) reimbursement for the actual and necessary expenses that WKMB incurred in the amount of \$2,260.41 (the “Application”), in each case for the period from January 1, 2002 through January 31, 2002 (the “Fee Period”). In support of this Application, WKMB respectfully states as follows:

**Retention of WKMB**

1. On April 2, 2001 (the “Petition Date”), the Debtors each filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code (collectively, the “Chapter 11 Cases”). On April 2, 2001, the Court entered an order procedurally consolidating the Chapter 11 Cases for administrative purposes only. Since the Petition Date, the Debtors have continued to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. On April 12, 2001, the office of the United States Trustee appointed (i) a committee of unsecured creditors in the Chapter 11 Cases (the “Creditors’ Committee”), (ii) a committee of asbestos personal injury claimants (the “Asbestos Personal Injury Committee”) and (iii) a committee of asbestos property damage claimants (the “Asbestos Property Damage Committee.”). On June 18, 2001, the office of the United States Trustee appointed a committee of equity security holders (the “Equity Security Holders’ Committee,” collectively with the Creditors’ Committee, the Asbestos Personal Injury Committee and the Asbestos Property Damage Committee, the “Committees”).

2. By this Court’s order dated June 21, 2001, the Debtors were authorized to retain WKMB as their special counsel, effective as of the Petition Date, with regard to environmental and litigation matters (the “Retention Order”). The Retention Order authorizes the Debtors to

compensate WKMB at hourly rates charged by WKMB for services of this type and to be reimbursed for actual and necessary out-of-pocket expenses that it incurred, subject to application to this Court in accordance with the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, all applicable local rules and orders of this Court.

3. The Retention Order also allowed for a special fee arrangement with the Debtors in connection with a pending litigation matter, *Interfaith Community Organization v. Honeywell International, Inc. et al* ('Honeywell litigation'). By Agreement with the Debtors, WKMB was entitled to receive its full standard hourly rates until June 21, 2001 when its standard hourly rates billed for the Honeywell litigation was reduced by 40% in return for an interest in the outcome of the Honeywell litigation. Thus, a 40% discount is applied to all professional fees billed to the Honeywell matter (Matter 6) after June 21, 2001.

4. As disclosed in the following affidavit:

Affidavit of Christopher H. Marraro in Support of Application for Order Under 11 U.S.C. § 327(a) and Fed. R. Bankr. P. 2014(a) Authorizing the Employment and Retention of Wallace King Marraro & Branson as Special Litigation and Environmental Counsel for the Debtors and Debtors in Possession (the "Original Affidavit"), filed June 4, 2001;

WKMB does not represent any interest adverse to the estates.

5. WKMB does not currently represent, but could in the future represent parties-in-interest in connection with matters unrelated to the Debtors and the Chapter 11 Cases. WKMB will update the Affidavits when WKMB becomes aware of material new information.

6. WKMB performed the services for which it is seeking compensation on behalf of the Debtors and their estates, and not on behalf of any committee, creditor or other person.



7. Pursuant to Fed. R. Bank. P. 2016(b), WKMB has not shared, nor has agreed to share, (a) any compensation it has received or may receive with another party or person other than with the partners, counsel and associates of WKMB, or (b) any compensation another person or party has received or may receive in connection with the Chapter 11 Cases.

8. This is the tenth application for interim compensation for services rendered that WKMB has filed with the Bankruptcy Court in connection with the Chapter 11 Cases.

**Reasonable and Necessary Services Rendered by WKMB-- Generally**

9. The WKMB attorneys who rendered professional services during this Fee Period are:

Name of Professional Person	Position with the applicant	Number of years as an attorney	Department	Hourly billing rate	Total billed hours	Total compensation
Christopher Marraro	Partner	18 Years	Litigation	\$440.00	78.80	\$34,672.00
William Hughes	Counsel	10 Years	Litigation	\$350.00	151.30	\$52,955.00
Tamara Parker	Associate	8 Years	Litigation	\$270.00	62.80	\$16,956.00
Angela Pelletier	Associate	3 Years	Litigation	\$225.00	74.90	\$16,852.50
Alec C. Zacaroli	Associate	4 Years	Litigation	\$210.00	4.70	\$987.00

10. The paraprofessionals of WKMB who have rendered professional services in these cases during this Fee Period are:

Name of Professional Person	Position with the applicant	Number of years in that position	Department	Hourly billing rate	Total billed hours	Total compensation
Barbara Banks	Paralegal	4 Years	Litigation	\$135.00	134.70	\$18,184.50
Natasha Bynum	Clerk	1.5 Years	Litigation	\$100.00	2.50	\$250.00

Name of Professional Person	Position with the applicant	Number of Years in that position	Department	Hourly billing rate	Total billed hours	Total compensation
Mahmoude Moasser	Paralegal	10 Years	Litigation	\$135.00	96.10	\$12,973.50
Reilley L. Smith	Paralegal	9 Months	Litigation	\$120.00	15.20	\$1,824.00
Keith Kaider	Paralegal	4 Years	Litigation	135.00	1.50	\$202.50

Grand Total for Fees: \$155,857.00  
Less 40% Discount on Honeywell Matter 6: ( 56,632.80)  
  
Total Due \$ 99,224.20

11. WKMB has advised and represented the Debtors in connection with certain litigation and environmental matters. These matters include the Honeywell litigation, cost recovery litigation against other private parties and representation of the Debtors before the U.S. Environmental Protection Agency in connection with the Libby, Montana asbestos remediation matter.

12. The rates described above are WKMB 's hourly rates for services of this type. Attached as Exhibit A is a detailed itemization and description of the services that WKMB rendered during this Fee Period. Based on these rates and the services performed by each individual, the reasonable value of such services is \$155,857.00. The WKMB attorneys and paraprofessionals expended a total of 622.5 hours for these cases during this Fee Period. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, the amount of fees requested is fair and reasonable given: (a) the complexity of these cases, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under the Bankruptcy Code.

13. Further, Exhibit A (a) identifies the individuals that rendered services in each Subject Matter, as defined and described below, (b) describes each activity or service that each individual performed and (c) states the number of hours (in increments of one-tenth of an hour) spent by each individual providing the services. Each numbered tab in Exhibit A corresponds to the matter number that WKMB assigned to each Subject Matter. If a Subject Matter does not appear, then WKMB did not bill time or expenses for that Subject Matter during this Fee Period, but may bill time for that Subject Matter in the future.

**Reasonable and Necessary Services Rendered by WKMB**

**Categorized by Matter**

14. The professional services that WKMB rendered during the Fee Period are grouped into the numbered and titled categories of subject matters described in Paragraphs 15-19 herein (the "Subject Matter(s)").

15. Matter 6 – Honeywell litigation

(Fees: \$141,582.00 less \$56,632.80=\$84,949.20, Hours: 587.60)

This Subject Matter involves time spent in litigation against Honeywell International, Inc. to recover substantial costs and damages and to compel Honeywell to clean up nearly a million tons of chromium process waste disposed of by a Honeywell predecessor, Mutual Chemical Company. Included is time preparing and filing motions, working on fact and expert discovery, undertaking factual and legal research and analysis and attending court hearings.

16. Matter 9 – Libby, Montana

(Fees: \$11,723.00; Hours: 29.10)

incoming telecopier transmissions. WKMB has negotiated a discounted rate for Lexis and Westlaw computer assisted legal research, which is approximately \$125/hour of online use of the standard Westlaw databases and approximately \$3.00/minute for Lexis databases. Computer assisted legal research is used whenever the researcher determines that using Lexis/Westlaw is more cost effective than using traditional (non-computer-based legal research) techniques.

21. A summary of expenses by type, as well as a detailed itemization and description of the disbursements made by WKMB on the Debtors' behalf during the Fee Period is attached hereto as Exhibit B. All of these disbursements comprise the requested sum for WKMB out-of-pocket expenses, totaling \$2,260.41. These disbursements are grouped in Exhibit B into the same numbered and titled categories of Subject Matters as the fees are grouped in Exhibit A. The numbered tabs within Exhibit B correspond to the numbers assigned to the matters described in Paragraphs 15-19 herein. Any missing Subject Matters merely indicate that no expenses were attributed to such Subject Matters during the Fee Period, although expenses may be attributable to such Subject Matters in the future. A summary of expenses by category for the entire Fee Period is also set forth in Exhibit B.

### **Representations**

22. WKMB believes that the Application is in compliance with the requirements of Del.Bankr.LR 2016-2.

20. Although every effort has been made to include all fees and expenses from the Fee Period in the Application, some fees and expenses from the Fee Period might not be included in the Application due to accounting and processing delays. WKMB reserves the right to make further application to the Court for allowance of fees and expenses for the Fee Period not included herein.

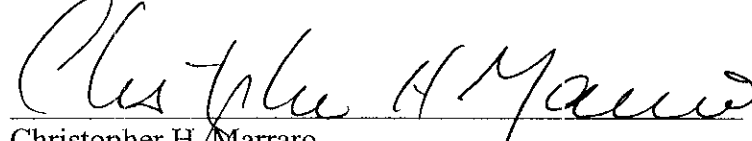
21. In summary, by the Application, WKMB requests compensation for fees and expenses in the total amount of \$158,117.41 consisting of (a) \$155,857.00 for reasonable and necessary professional services rendered and (b) \$2,260.41 for actual and necessary costs and expenses.

WHEREFORE, WKMB respectfully requests (a) that an allowance be made to it, as fully described above for the (i) 80% of the reasonable and necessary professional services WKMB has rendered to the Debtors during the Fee Period (\$79,379.36 after a discount credit for the Honeywell Matter 6 of \$56,632.80) and (ii) 100% of the reimbursement of actual and necessary costs and expenses incurred by WKMB during the Fee Period (\$2,260.41); (b) that both fees and expenses are payable as administrative expenses of the Debtors' estates; and (c) that this Court grant such further relief as is equitable and just.

Washington, D.C.  
Dated: February 21, 2002

Respectfully submitted,

WALLACE KING MARRARO & BRANSON PLLC

A handwritten signature in black ink, appearing to read "Christopher H. Marraro", is written over a horizontal line.

Christopher H. Marraro  
1050 Thomas Jefferson Street N.W.  
Washington, D.C. 20007  
(202) 204-1000

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re: ) Chapter 11  
)  
W. R. GRACE & CO., et al.,<sup>1</sup> ) Case No. 01-01139 (JJF)  
) (Jointly Administered)  
)  
Debtors. )

**VERIFICATION**

Christopher H. Marraro, after being duly sworn according to law, deposes and says:

1. I am a partner with the applicant firm, Wallace King Marraro & Branson, PLLC and I am a member in good standing of the bars of the State of New Jersey and District of Columbia.

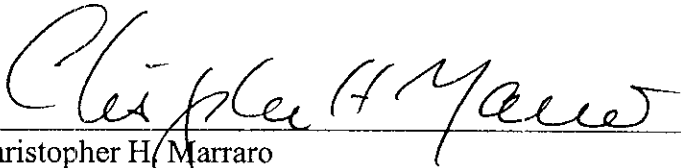
2. I have personally performed certain of, and overseen the legal services rendered by Wallace King Marraro & Branson PLLC as special litigation and environmental counsel

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<sup>1</sup> The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-1 Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food 'N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc.), E&C Liquidating Corp., Emerson & Cuming, Inc., Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

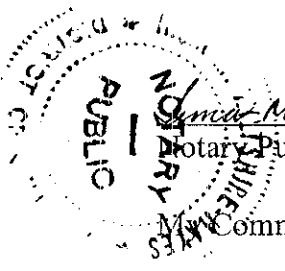
to the Debtors and am thoroughly familiar with all other work performed on behalf of the Debtors by the lawyers and other persons in the firm.

3. The facts set forth in the foregoing Application are true and correct to the best of my knowledge, information and belief.

  
\_\_\_\_\_  
Christopher H. Marraro

In the District of Columbia

SWORN TO AND SUBSCRIBED  
before me this 21st day of February 2002.

  
Cynthia M. Wiltshire-Daugherty  
Notary Public  
Commission Expires: July 14, 2006.

# **EXHIBIT A**



**MATTER 6 - HONEYWELL  
FEES - JANUARY 2002**



WALLACE KING MARRARO & BRANSON, PLLC  
1050 THOMAS JEFFERSON STREET, N.W.  
WASHINGTON, DC 20007

Phone 202.204.1000  
Fax 202.204.1001

February 21, 2002

W. R. Grace & Co.  
Attention: Richard Senfleben  
7500 Grace Drive  
Columbia, MD 21044

Invoice #12652

For Professional Services Rendered in Connection with Honeywell, Inc. - Matter 6

Professional Services:

		<u>Hours</u>
01/02/02	RLS Review and identify relevant documents produced by Mueser Rutledge for Mr. Hughes.	3.40
TP	Review of undisputed facts related to costs, e-mail to Ms. Banks requesting supporting affidavit cited therein and review of affidavit retrieved (.5 hrs.); reviewed costs summary memo prepared by Ms. Flax and Excel spreadsheet of costs to determine the nature of costs for which Grace seeks to recover and when incurred (1.7 hrs.); Westlaw research and located law review articles related to NCP and necessary cost and began reaview of same for applicable case law (5.7 hrs.).	7.90
BB	Read, coordinate, organize and prepare new correspondence for incorporation into indexed case files (2.1 hrs.); research electronic case files and pleadings file for pertinent information re undisputed facts for Ms. Parker, collect and consult with Ms. Parker re same (.8 hrs); locate scanned memorandum re damages and email to Ms. Parker (.1 hrs.); consult with	3.20

W. R. Grace &amp; Co.

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		<u>Hours</u>
	Ms. Kelly re preparation of trial exhibits list (.2 hrs.).	
01/02/02 MM	Review and incorporate all recently filed memorandums into files (.2 hrs.); continue to research project for Ms. Pelletier re Section F (i.e., contribution allocation factors) of the Chemical Waste Litigation Reporter (1.2 hrs.); case management (.7 hrs.).	2.10
01/03/02 BB	Continue list of relevant facts and information in 1992 deposition transcripts for Mr. Hughes (2.6 hrs.); continue cross-referencing entries on list of trial exhibits against exhibits, quality check documents and make corrections and changes as appropriate( 2.9 hrs.).	5.50
AP	Research for motion to exclude experts.	6.00
MM	Finalize on-line research via Avis Lexis-Nexis re project assigned by Ms. Pelletier re producing various cases from Section F (i.e., contribution allocation factors of the chemical Waste Litigation Reporter, specifically dealing with percentage of liabilities, pending final compiling of data for Ms. Pelletier's review (2.6 hrs.).	2.60
TP	Continued review for Mr. Hughes of law review articles, including Westlaw research to obtain cited cases, reviewed cases and drafted summary of relevant language with citations.	7.80
01/04/02 RLS	Finish review of depositions from Allied related litigation (1.7 hrs.); draft memo for Mr. Hughes summarizing pertinent information recovered from the depositions (.3 hrs.); conduct review of Mueser Rutledge documents regarding heaving issue (1.7) hrs..	3.70
CHM	Review contract with company consultants and conference call with A. Nagy (.5 hrs.); conference with J. Agnello re amendment to bankruptcy court order. (.5 hrs.).	1.00

W. R. Grace &amp; Co.

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		<u>Hours</u>
01/04/02 BB	Continue cross-referencing trial exhibits list entries against trial exhibits, quality check documents and make corrections and changes as appropriate (2.1 hrs.); review, analyze, organize and prepare new correspondence and case documents and incorporate into indexed case files (1.9 hrs.); create Bates labels and label 11/29/01 Honeywell supplemental document production of Site reports, analytical data and emails re Study Area 6 and create new production file (.7 hrs.); incorporate interoffice research and issue analyses memos into electronic case files (.5 hrs.); prepare summary report of relevant site facts and testimony of Faranca 1992 deposition transcript for Mr. Hughes (2.9 hrs.); research electronic and case files for pertinent case agreements and email to attorney for Ms. Campbell (.4 hrs.).	8.50
TP	Continued research for Mr. Hughes to obtain cases related to NCP compliance, checked cases for any history and documenting any history related to NCP or New Jersey Spill Act issues.	3.10
MM	Review recent correspondence distributed by Ms. Kelley and Ms. Campbell (.4 hrs.); review, organize and compile all research and forward to Ms. Pelletier with memorandum for review (1.2 hrs.); case management (.6 hrs.).	2.20
01/05/02 BB	Continue cross-referencing designated trial exhibits against entries on exhibits list, quality check and make corrections and changes as appropriate for Mr. Hughes.	9.40
01/06/02 BB	Read, analyze and prepare summary index of deposition transcripts for Mr. Hughes.	7.20
01/07/02 AP	Designate deposition testimony (1.8 hrs.); research for motion to exclude Honeywell experts (2.0 hrs.).	3.80

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		<u>Hours</u>
01/07/02 RLS	Finish review of and prepare Mueser Rutledge documents for Mr. Hughes' review (3.4 hrs.); draft memo for Mr. Hughes regarding information found (.3 hrs.).	3.70
BB	Preparation of summary index of deposition transcripts and quality check same for Mr. Hughes.	6.00
MM	Office conference with Ms. Pelletier re review of recent research projects and other matters relating to pretrial (.3 hrs.); preliminary preparation work (i.e., searching files for detailed information) re drafting deposition designations per Ms. Pelletier's request (1.1 hrs.); case management (.8 hrs.).	2.20
WH	Review letter and supporting documents from Mr. Caffrey re proposed allocation of costs for expert depositions (.8 hrs.); conferences with Mr. Caffrey and experts re allocation of expert deposition costs (1.4 hrs.); review expert invoices and related materials and confer with Ms. Banks re Honeywell's payment of Grace's deposition costs (1.1 hrs.); conference with Dr. Valera re billing issue and his review of selected materials re heaving problems at Baltimore site (.5 hrs.); review deposition transcripts and designate selected passages for use at trial (5.1 hrs.).	3.90
NAB	Download, print and review set of photographs of the North and South swales taken at our request re assessment of the North and South Swale issues for Mr. Hughes (1.1 hrs.); arrange for copies of same to be made for exhibit set (.3 hrs.); quality check copies of photos (.3 hrs.); organize and incorporate into case files (.6 hrs.); add copy to exhibit set (.2 hrs.).	2.50
TP	Began binder of case law re NCP and New Jersey Spill Act gathered to date with cite list.	1.40

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		<u>Hours</u>
01/08/02	CHM Respond to Lowenstein letter re Bankruptcy stay (1.2 hrs.); conference with expert witnesses re exhibits (1.4 hrs.).	2.50
	TP Reviewed EPA-NCP guidance and summarized relevant portions related to removal and remedial actions under NCP.	2.10
	AP Review correspondence (.5 hrs.); calls with Lowenstein re expert expenses (.3 hrs.); review CERCLA allocation cases (1.6 hrs.); motion to exclude Honeywell experts (4.0 hrs.).	6.40
	WH Review SI Group invoice and confer with Mr. Golliday re PDM issue (.5 hrs.); calls to PDM re status of pilot study and documentation of same (.4 hrs.); review materials provided by Dr. Valera re test borings and related matters at Roosevelt Drive-In Site and confer with Dr. Valera re same (1.8 hrs.); work on cross-examination outline/materials and trial exhibits re geotechnical issue (6.1 hrs.).	3.80
	BB Incorporate new correspondence into indexed Case files (1.2 hrs.); consult with Mr. Hughes on correspondence received from Lowenstein re payment of deposition costs and 1/7/01 email from case expert (.3 hrs.); research case files, collect and prepare pertinent correspondence re same (.2 hrs.); respond to 1/7/01 email from case expert (.2 hrs.); cross reference and analyze deposition invoices against response from defendant to our request for payment for Mr. Hughes (1.0 hrs.); prepare table of analysis of invoices for Mr. Hughes (1.7 hrs.)	4.60
	RLS Office conference with Mr. Hughes regarding Mueser Rutledge document review (.3 hrs.); office conference with Ms. Banks regarding case database and other Muerse documents (.3 hrs.); conduct a review of and search for Muerse reports in the document database (1.9 hrs.).	2.50

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		<u>Hours</u>
01/09/02	RLS Conclude review of document database for Mueser documents (1.3 hrs.); compose memorandum for Mr. Hughes (.2 hrs.)	1.50
	TP Continued review of cases related to NCP compliance, summarized relevant portions, and checked cases for negative history to ensure they were still good law.	7.90
	BB Research Lexis and Thomas Internet service for news articles and text of congressional hearings on Brownfields legislation re innocent landowners for Mr. Hughes (1.9 hrs.); download, coordinate and prepare for Mr. Hughes and consult with Mr. Hughes re research results (.8 hrs.); research expert deposition transcripts and gather actual time spent in depositions (.9 hrs.); analyze invoices received from defendant for expert depositions, cross reference itemized billed amounts against actual deposition times and items billed and prepare table of analysis (2.4 hrs.); compute costs, update table and consult with Mr. Hughes re same (1.8 hrs.); follow up on issues re defendant's expert invoices and prepare email of same for Mr. Hughes (.8 hrs.); incorporate new correspondence into indexed case files (.7 hrs.)	9.30
	AP Motion to exclude Honeywell experts.	4.50
	MM Continue to review various documents (i.e., potential trial exhibits) received from Mr. Goad and revise chart reflecting details of stated documents (6.9 hrs.); case management (.7 hrs.).	7.60
	WH Analyze recent CERCLA amendments for possible applicability to CERCLA claims in the Honeywell case (1.3 hrs.); confer with Dr. Schmiermund re Parsons memoranda on heaving issue and review same (.8 hrs.); conferences with Dr. Chapman's office and Ms. Banks re billing matter (.4 hrs.); review Geomega invoice and confer with Dr. Davis'	8.60

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Hours

staff re same and groundwater discharge issue (.8 hrs.); legal research re potential claim against PRP relating to interference with administrative process (3.0 hrs.); review materials collected by Ms. Banks re corporate reorganization and designate selected documents for use as trial exhibits (2.3 hrs.).

01/09/02 CHM	Work on pre-trial document -- revise stipulations and review Mutual documents re exhibits (7.5 hrs.); work with experts on discharge issues related to drainage (1.0 hrs.).	8.50
01/10/02 BB	Continue incorporating new correspondence into indexed case files (.9 hrs.); consult with Ms. Parker and Mr. Hughes re resolution of issues surrounding defendant's expert deposition invoices (.5 hrs.); evaluate record of experts' invoices for information pertinent to response letter to defendant for Mr. Hughes and Ms. Parker (1.0 hrs.); revise analysis table and prepare email memo of results per Ms. Parker's specific requests (.7 hrs.); consult with Ms. Parker re same (.4 hrs.); assist Messrs. Marraro and Hughes in resolving issues re outstanding expert invoices (1.8 hrs.); continue cross referencing entries on list of trial exhibits against designated exhibits, make corrections as appropriate (2.3 hrs.).	7.60
MM	Continue to analyze various documents (i.e., potential trial exhibits) received from Mr. Goad and revise chart reflecting details of stated documents (8.6 hrs.).	8.60
AP	Review trial exhibit documents (2.0 hrs.); motion to exclude Honeywell experts (3.1 hrs.).	5.10
TP	Office conference with Mr. Hughes re letter from Mr. Caffrey detailing expert deposition charges (.8 hrs.); emailed request to Ms. Banks for additional information on this issue in preparation for drafting responsive letter (.3 hrs.); reviewed materials gathered (including deposition transcripts to identify where experts	7.30



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Hours

traveled from for deposition) and drafted letter questioning Honeywell's expert's time charges (4.3 hrs.); continued review of cases related to NCP compliance (1.2 hrs.); summarized relevant portions and checked cases for negative history to ensure they were still good law (.7 hrs.).

01/10/02 WH	Review materials produced by Honeywell re ecological risk assessment issues and designate selected documents re same for use at trial (2.8 hrs.); legal research re potential claim against PRP relating to interference with administrative process and confer with Mr. Marraro re same (2.8 hrs.); collect trial exhibits and work on database of trial exhibits and cross-examination materials (2.4 hrs.); review geotechnical documents collected by Mr. Smith and incorporate same into trial exhibits (1.3 hrs.).	9.30
RLS	Review, organize and incorporate Mueser materials into the case file.	0.40
01/11/02 BB	Incorporate new correspondence into indexed case files and create new files (.7 hrs.); review and quality check duplicates of trial exhibits (.5 hrs.); continue cross referencing designated trial exhibits against exhibits list and make corrections as appropriate (5.3 hrs.); continue preparation of deposition designations table for Mr. Hughes (.8 hrs.).	7.30
WH	Review correspondence from Terris Pravlick re summary judgment motions and confer with Ms. Pelletier and Mr. Marraro re same (.5 hrs.); confer with Ms. Flax re requirements for trial brief and begin preparing same (3.6 hrs.); confer with paralegal re preparing chart depicting opinions to be expressed by Grace and Honeywell experts and direct/cross-examination points related to same (.5 hrs.); review documents collected by Grace	8.80

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		<u>Hours</u>
	expert re environmental issues at site and incorporate into trial exhibits (4.2 hrs.).	
01/11/02 MM	Continue to analyze various documents received from Mr. Goad and revise chart reflecting details of stated documents (7.1 hrs.).	7.10
TP	Continued review of cases related to NCP compliance including standard for determining when removal action is warranted and distinction between removal and remedial actions (3.8 hrs.); summarized relevant portions in draft memo analyzing NCP authority (3.1 hrs.); reviewed changes to draft letter e-mailed by Mr. Hughes (.2 hrs.); sent e-mail in response to his changes and to his voicemail explaining how Grace experts charged for deposition time and travel time and made revisions to letter in accordance with e-mail comments (.2 hrs.).	7.30
AP	Review trial exhibit documents (3.4 hrs.); motion to exclude Honeywell experts (2.6 hrs.).	6.00
01/14/02 WH	Confer with Ms. Parker re letter to Lowenstein on expert deposition issue (.3 hrs.); review and revise draft letter (.3 hrs.); confer with client re payment of expert deposition costs (.2 hrs.); review letter from Mr. Caffrey re Deming discovery issue and confer with Mr. Marraro same (.6 hrs.); legal research re Deming discovery issue (.8 hrs.); confer with paralegals re comparison of revised Mueser privilege log and Mueser documents produced by Honeywell and its contractors (.3 hrs.); review letter from Mr. Caffrey re stipulation on bankruptcy issue and related documents (.4 hrs.); review documents produced by Honeywell on risk assessment issues and incorporate into trial exhibits (4.4 hrs.); review deposition excerpts collected by Mr. Smith and incorporate into list of designations for use at trial (1.4 hrs.).	8.70

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		<u>Hours</u>
01/14/02 MM	Continue to review various documents received from Mr. Goad and amend chart reflecting details of stated documents (4.9 hrs.); case management (.7 hrs.).	5.60
TP	Email with Mr. Hughes re status of letter re expert deposition fees (.3 hrs.); revised letter and sent letter after obtaining and confirming direct fax number for Mr. Caffrey (.8 hrs.); reviewed Ledbetter outline to identify additional cases on NCP and downloaded cases from Westlaw and analyze (2.5 hrs.); updated binder with research (.4 hrs.).	4.00
BB	Review and verify corrected copies of designated trial exhibits returned from Copy Center (.7 hrs.); incorporate same into collection of trial exhibits (.8 hrs.); check and verify same against exhibit descriptions on exhibits list and make corrections as appropriate (2.2 hrs.); update bankruptcy records and review docket on Pacer (.8 hrs.); verify, collect and email pertinent counsel information to Ms. Parker (.3 hrs.); review and incorporate new correspondence into indexed case files (.7 hrs.).	5.50
AP	Research and draft pre-trial motion re expert testimony.	5.80
01/15/02 WH	Review selected documents on environmental contamination issues at the site and designate for use as trial exhibits in support of Grace's RCRA claim (4.2 hrs.); collect and review pertinent trial exhibits re Honeywell's dilatory behavior in conducting site investigation and remediation (2.5 hrs.); review documents re human health issue for designation as trial exhibits and revise database entries re same (2.3 hrs.); confer with Dr. Goad and staff re risk assessment issue (.6 hrs.).	9.60
AP	Research and draft pre-trial motion.	6.50

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		<u>Hours</u>	
01/15/02	BB	Continue review of designated trial exhibits, quality check entries on exhibits list and make corrections and revisions as appropriate.	4.50
	TP	Reviewed and summarized cases on NCP compliance and application of 1986 and 1990 versions.	4.30
	MM	Finalize and review various documents received from Mr. Goad and revise chart reflecting details of stated documents for Mr. Hughes' review (3.9 hrs.); case management (.3 hrs.).	4.20
01/16/02	CHM	Work on pre-trial order (4.0 hrs.); meeting with plaintiffs re trial issues (2.2 hrs.).	6.20
	AP	Prepare draft pre-trial motion.	4.70
	MM	Review recent correspondence distributed by Ms. Campbell (.4 hrs.); finalize the compilation of documents received from Mr. Goad and put chart reflecting all documents in final and forward to Mr. Hughes with memorandum for review as well as via e-mail (2.8 hrs.); office conference with Mr. Hughes re completed project as well as further instructions to compare chart to current chart detailing all trial exhibits to assure they are present and perform preliminary compare and contrast of charts (.7 hrs.); case management (.3 hrs.).	4.20
	TP	Reviewed Ledbetter outline for additional cases re necessary costs allowed in private cost recovery actions under CERCLA and obtained cases from Westlaw (2.0 hrs.); updated list of cases obtained to date (.4 hrs.); phone conference with Mr. Caffrey re expert fees and need to review invoices (.4 hrs.).	2.80
	BB	Research NJDEP Internet site re whether NJDEP's categorized two Chemical Land Holdings Kerney Town Chromate contaminated sites as residential, download,	2.60

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Hours

	coordinate and prepare documents and create binders of same for Mr. Marraro (1.9 hrs.); consult with Mr. Marraro re research results (.1 hrs.); place telephone call to NJDEP re same for Mr. Marraro and provide results of call (.3 hrs.); review email received from expert and prepare and incorporate new document into electronic case files (.3 hrs.)	
01/16/02 WH	Review selected documents re Honeywell's interim remedial measures at the site and designate for use as trial (1.8 hrs.); review depositions and designate selected passages for use in challenging Honeywell's costs (1.4 hrs.); confer with Mr. Agnello re filing motion to compel production of Deming's documents and prepare letter re same (2.6 hrs.); collect and analyze documents to be used in support of Grace's claim against Honeywell under the license agreement (1.4 hrs.); review environmental documents collected by Mr. Moasser and incorporate same into trial exhibits (2.2 hrs.).	9.40
01/17/02 MM	Continue to compare and contrast trial exhibits charts per Mr. Hughes request (2.5 hrs.); case management (.2 hrs.).	2.70
AP	Prepare in limine motions.	6.00
BB	Continue review of designated trial exhibits, cross reference against document entries on the draft trial exhibits list, and make appropriate corrections and revisions.	3.10
01/18/02 CHM	Conference calls with client re CLH (.6 hrs.); prepare requests for admission (3.2 hrs.); work on stipulations (2.0 hrs.).	5.80
AP	Prepare in limine motions.	7.00
WH	Collect and analyze documents re relevant corporate acquisition/reorganization issues and incorporate same into trial exhibits (6.2 hrs.); review Judge Cavanaugh's orders denying	3.80

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Hours

	Honeywell's motion to supplement record and plaintiff's motion to amend and confer with Mr. Marraro re same (1.2 hrs.); confer with Ms. Pelletier re motion in limine (.2 hrs.); work on trial brief (1.2 hrs.).	
01/18/02 BB	Research Westlaw and NJDEP web site for NJ Industrial Site Recovery Act 26B for Mr. Marraro (.8 hrs.); download,, coordinate and prepare binders of same (.1.7 hrs.); confer with Mr. Hughes re status of pre-trial preparation and best evidence rule re selected documents (.3 hrs.); research case index, collect and prepare pertinent documents for Mr. Hughes (.3 hrs.); review new case correspondence, prepare and incorporate into indexed case files (.1.1 hrs.); continue review, cross referencing designated trial exhibits against exhibits list and make corrections and revisions as appropriate (2.8 hrs.)	7.00
01/19/02 MM	Continue to compare and contrast trial exhibits charts per Mr. Hughes request.	4.50
01/21/02 CHM	Work on stipulations (5.5 hrs.); conference with experts re payments (1.0 hrs.).	6.50
01/22/02 BB	Quality check table of analysis of cross referenced and identified duplicates in documents collected for trial exhibit review by case expert, compare to list of designated trial exhibits, make corrections and revisions as appropriate, and prepare verified documents for Mr. Hughes' review (8.8 hrs.); collect and prepare document for Ms. Pelletier (.2 hrs.); consult with Ms. Pelletier re trial exhibits preparation and arrangements for attorney review/designation (.3 hrs.); consult with Mr. Hughes by telephone re follow up and clarification of resolution of trial preparation issues (.3 hrs.); prepare deposition designations for Ms. Pelletier (.4 hrs.)	10.00

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		<u>Hours</u>
01/22/02 AP	Conference with M. Moasser re cite-check brief (.3 hrs.); conference with B. Hughes re pre-trial preparation (.5 hrs.); conference with C. Marraro re Riverkeeper claims (.4 hrs.); compare and draft memo regarding Riverkeeper and ICO claims (1.9 hrs.); review correspondence relating to Chapman testimony and documents per B. Hughes (1.3 hrs.); designate deposition testimony for pre-trial submission (2.3 hrs.).	6.70
MM	Finalize comparison of my chart against Ms. Kelley's trial exhibit chart and produce all documents to Mr. Hughes via Ms. Banks for review (1.8 hrs.); forward e-mail to Mr. Hughes re same (.1 hrs.); office conference with Ms. Banks re same (.2 hrs.); office conferences with Ms. Pelletier re reviewing draft in limine motions and insert all requested information (.2 hrs.); search Westlaw, Federal Rules of Evidence and other resources re locating requested information to finalize brief (2.3 hrs.); forward revised brief to Ms. Pelletier for review (.1 hrs.); follow-up office conference with Ms. Pelletier re attempting to produce copy of Honeywell expert report and deposition transcript from Lockheed, et al., v. Crane, et al. (.2 hrs.); search Westlaw and Pacer re location of stated documents (.8 hrs.); telephone conferences with clerk of the court of the Federal District Court in Los Angeles and attorney Mary Morningstar at Lockheed re producing stated material (.4 hrs.).	6.10
CHM	Review Pelletier comparison of cross-claims in Riverkeeper and ICO case (.5 hrs.); conference with J. Agnello (.6 hrs.).	1.10
WH	Review and revise database entries re trial exhibits (1.6 hrs.); review deposition transcripts from Abeille-Paix case and designate relevant portions for use at trial (5.3 hrs.); work on cross-examination materials re	9.20

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		<u>Hours</u>
	Honeywell's remediation and groundwater experts (2.3 hrs.).	
01/23/02 TP	Emails with Mrs. Banks re question on Kanter invoice (.2 hrs.); drafted summary of Grace experts who did not charge travel time to Honeywell with locations from which they traveled and emailed to Mr. Caffrey (.9 hrs.); reviewed cases on NCP issue (.4 hrs.).	1.30
BB	Review, assess and resolve issues re exhibits list and designated exhibits (3.0 hr.); quality check exhibits entries against designated exhibits and note corrections and revisions with Ms. Kelly (1.2 hr.); consult with Mr. Hughes re Mr. Wong's 1992 deposition summaries (.2 hrs.); provide guidance and assistance to Mr. Moasser re Mr. Wong 's 2001 deposition summaries (.3 hrs.); research case and electronic indices, collect and prepare pertinent documents re PDM subpoena for Mr. Hughes (.4 hrs.); consult with Ms. Pelletier re same (.2 hrs.); consult with Mr. Hughes re resolution of trial exhibits issues and preparation for attorney review and analysis of designated exhibits (.4 hrs.); collect and prepare additional documents sent to Dr. Koch for Mr. Hughes (.3 hrs.); consult with Mr. Hughes re RI Report and UST closure documents for trial exhibits review (.3 hrs.); research case files and draft exhibits list re same and provide results to Mr. Hughes (.3 hrs.); continue review, assessment and resolution of issues re exhibits list and designated exhibits (.6 hrs. )	7.20
WH	Review new Knight Piesold invoice and confer with Dr. Valera about status of assignments (.4 hrs.); confer with Ms. Pelletier re collecting cross-examination materials for use with NCP expert (.3 hrs.); work on cross-examination materials and trial exhibits re Honeywell's environmental experts (4.3 hrs.); review selected documents re acquisition of the site and designate for use as trial exhibits (2.6 hrs.);	3.60



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		<u>Hours</u>
	legal research re costs recovery issue under CERCLA (1.3 hrs.).	
01/23/02 AP	Conference with B. Hughes re pre-trial and re Lockheed case (.4 hrs.); review trial exhibit documents and Parsons documents (3.0 hrs.); designate deposition testimony (1.5 hrs.).	4.90
MM	Review recent correspondence distributed by Ms. Campbell (.5 hrs.); office conference with Mr. Hughes re status of pending motions for summary judgment as well as preparing summaries of various depositions of James Wong (.4 hrs.); office conferences with Ms. Banks re same as well as other miscellaneous matters (.4 hrs.); follow-up telephone conferences with Federal District Court, Los Angeles and Ms. Morningstar of Lockheed re obtaining expert report and deposition transcript of Tod Delaney (i.e., Lockheed v. Crane) (.8 hrs.); follow-up search on Westlaw re same (.9 hrs.); office conference with Ms. Pelletier and Mr. Hughes re status of same (.2 hrs.); preliminary review and drafting of summaries of depositions of James Wong (4.3 hrs.).	7.80
01/24/02 BB	Collect and prepare NJDEP correspondence relied upon by Dr. Koch designated as trial exhibits (1.7 hrs.); research case and electronic files and analyze Honeywell/NJDEP correspondence re site ecological assessment issues for Mr. Hughes (2.1 hrs.); collect, prepare and consult with Mr. Hughes re results (.7 hrs.); QC designated trial exhibits nos. 297-320.	11.40
WH	Review documents for designation as trial exhibits and revise database entries re same (3.6 hrs.); review deposition transcripts and designate selected passages for use at trial (5.3 hrs.).	8.90

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		<u>Hours</u>
01/24/02	AP Review and designate deposition testimony.	1.50
	MM Continue to review and draft summaries of James Wong various depositions taken by Mr. Marraro and Mr. Hughes (3.9 hrs.); office conference with Ms. Pelletier re forward e-mail to Mr. Marraro and Mr. Hughes re providing them with all information in regard to tracking down expert report and deposition in which expert testified on behalf of Lockheed Martin (.2 hrs.); forward all stated information as requested (.2 hrs.); office conference with Ms. Banks re status of pending deposition summaries (.2 hrs.); case management (.4 hrs.).	4.90
01/25/02	TP Email with Mrs. Banks re expert costs and requested hourly rate of any expert that had not included travel time on deposition cost invoices (.2 hrs.); calculated based on estimated travel time and experts' hourly rate the amount of travel time due from Honeywell and emailed proposed amount to Mr. Caffrey (.3 hrs.).	0.50
	CHM Meeting with A. Nagy (3.5 hrs.); review court order re motion to strike (.3 hrs.); conference with client re same (.2 hrs.).	4.00
	BB Read, analyze and compile case file documents re Grace's acquisition of Daylin for Messrs. Marraro and Hughes (.9 hrs.); review newly designated trial exhibits, prepare and organize for entry on trial exhibits list (1.4 hrs.); research case files and GRA production CDs, collect and prepare documents to resolve issues re designated trial exhibits for Mr. Hughes (6.8 hrs.); collect and prepare pertinent document for Mr. Marraro (.4 hrs.).	9.50
	WH Review Grace experts' documents for designation as trial exhibits and revise database re same (6.4 hrs.); work on cross-examination and direct examination outlines and materials for trial (2.4 hrs.).	8.80

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		<u>Hours</u>
01/25/02	MM Continue to review and draft summaries of James Wong various depositions taken by Mr. Marraro and Mr. Hughes (3.1 hrs.); case management (.7 hrs.).	3.80
01/26/02	BB Continue reading and analyzing corporate records re Grace's acquisition of Daylin and create chronology chart for Messrs. Marraro and Hughes.	4.50
01/27/02	BB Continue reading and analyzing corporate records re Grace's acquisition of Daylin and prepare chronology chart for Messrs. Marraro and Hughes	0.80
01/28/02	TP Phone conference with Mr. Caffrey negotiating expert deposition fees (.6 hrs.); drafted letter documenting agreement as he requested and emailed draft to Mr. Hughes (1.5 hrs.).	2.10
CHM	Site visit to review various issues and projects onsite; conference call with J. Agnello; call to Lowenstein.	3.50
MM	Continue to review and prepare brief summaries relating to James Wong (1.9 hrs.); office conference with Ms. Banks re status of same and other pending matters (.2 hrs.); office conference with Ms. Pelletier re cite checking brief in support of Grace's motion in limine to exclude testimony of Honeywell experts (.1 hrs.); telephone conference with Mr. Landry re obtaining counsel information as to who represented Crane, et al (.2 hrs.); search Westlaw re same (.4 hrs.); case management (.4 hrs.).	3.20
WH	Work on cross-examination materials for Honeywell's experts (4.8 hrs.); review and revise draft in limine motion from Ms. Pelletier (1.3 hrs.); confer with Ms. Parker re NCP compliance issue and collect evidence in support of same (1.8 hrs.); conferences with	8.70

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		<u>Hours</u>
	Ms. Banks and Mr. Mousser re status of assignments (.8 hrs.).	
01/29/02 MM	Review correspondence distributed by Ms. Campbell (.2 hrs.); continue to review various depositions of James Wong and prepare brief summaries of same (3.3 hrs.); case management (.4 hrs.).	3.90
WH	Review record for relevant documents to be used in challenging Honeywell's costs (3.2 hrs.); conferences with Ms. Banks and Mr. Moasser re status of assignments (.6 hrs.); revise list of stipulated facts for pretrial order (.9 hrs.); collect/designate documents to be used at trial in support of Grace's response costs (3.7 hrs.).	8.40
CHM	All-day meeting at Carella Byrne re damage issues and other matters.	8.00
TP	Phone conference with Mr. Hughes re draft letter to Mr. Caffrey re costs for expert deposition (.2 hrs.); calculated amount due and revised letter (.6 hrs.).	0.80
01/30/02 MM	Continue reviewing and preparing brief deposition summaries of all James Wong's depositions taken by Mr. Marraro and Mr. Hughes (3.4 hrs.); follow-up telephone conferences with Mr. Landre re status of obtaining information pertaining to representing counsel of Crane in Lockheed v. Crane in 1996 (.6 hrs.); search Westlaw re same (.7 hrs.); review correspondence distributed by Ms. Campbell (.4 hrs.); case management (.8 hrs.).	5.90
WH	Confer with Mr. Caffrey re production of Valera document (.3 hrs.); prepare stipulation of counsel re production of Valera document and send to Mr. Caffrey (.8 hrs.); collect/designate trial exhibits regarding	8.60

W. R. Grace &amp; Co.

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		<u>Hours</u>
	relevant corporate reorganization/acquisition issues (5.7 hrs.); work on trial brief (1.8 hrs.).	
01/30/02 CHM	Review expert deposition regarding motion to compel.	1.50
TP	Office conference and emails with Mr. Hughes and Mrs. Banks re name and addresses of Grace representatives to send check for expert costs (.4 hrs.); provided same to accounting office at Mr. Caffrey's request (.2 hrs.).	0.60
01/31/02 WH	Revise stipulation re discussions with Mr. Caffrey (.3 hrs.); review documents re human health issue for designation as trial exhibits and revise database entries re same (2.8 hrs.); confer with Dr. Goad's staff re trial prep issues and status of assignments (.8 hrs.); review and designate relevant DEP correspondence for use as trial exhibits (2.2 hrs.); review deposition transcripts re designations for pretrial order (3.1 hrs.).	9.20
MM	Continue to follow-up telephone conferences with Attorney Toohey at Paul Hastings' office in Los Angeles re obtaining firm who represented Crane in Lockheed v. Crane re obtaining copy of Dr. Delaney's expert report and deposition transcript for Ms. Pelletier (.3 hrs.); office conferences with Mr. Hughes and Ms. Banks re status of producing case documents relating to damages per Ms. Flax's 1/30/02 memorandum (.4 hrs.); follow-up telephone conference with Ms. Flax re same (.2 hrs.); continue to search case databases and other case filings re producing requested documents relating to damages per Ms. Flax's request (2.9 hrs.); continue to review and prepare brief summaries of James Wong deposition transcripts (2.5 hrs.); case management (.6 hrs.).	6.90

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		<u>Hours</u>	
01/31/02	TP Phone conference with Mr. Hughes re privilege for consultant report when seeking costs (.3 hrs.); began Westlaw research re same (1.3 hrs.).	1.60	
	KK Scan and OCR expert reports in preparation for Mr. Hughes' expert summary chart.	1.50	
			<u>Amount</u>
Total Fees		587.60	\$141,582.00
01/31/2002 Less Deduction of 40% of Fees Per Agreement			(\$56,632.80)
Balance Due			<u>\$84,949.20</u>

## Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>
Barbara Banks, Paralegal	134.70	135.00
Natasha A. Bynum, Legal Clerk	2.50	100.00
William Hughes, Counsel	151.30	350.00
Keith Kaider, Paralegal	1.50	135.00
Christopher H. Marraro, Partner	48.60	440.00
Mahmoude Moasser, Paralegal	96.10	135.00
Tamara Parker, Associate	62.80	270.00
Angela Pelletier, Associate	74.90	225.00
Reilly L. Smith, Paralegal	15.20	120.00

**MATTER 9 - LIBBY, MT.**  
**FEES - JANUARY 2002**



WALLACE KING MARRARO & BRANSON, PLLC  
 1050 THOMAS JEFFERSON STREET, N.W.  
 WASHINGTON, DC 20007

Phone 202.204.1000  
 Fax 202.204.1001

February 21, 2002

W. R. Grace & Co.  
 Attention: William Corcoran  
 Vice President-Public & Regulatory Affairs  
 7500 Grace Drive  
 Columbia, MD 21044

Invoice #12655

For Professional Services Rendered in Connection with Libby, Montana - Matter 9

Professional Services:

		<u>Hours</u>
01/02/02	CHM Conference call with client and review articles from client.	0.80
01/08/02	CHM Review articles (.3 hrs.); conference call with B. Corcoran (.2 hrs.).	0.50
01/10/02	CHM Conference with B. Corcoran (.5 hrs.); conference with EPA and review asbestos articles (.7 hrs.).	1.20
01/11/02	CHM Conference call with EPA.	0.30
01/14/02	ACZ Discussions with C. Marraro regarding EPA's conflicting asbestos assessments at Libby and WTC site (.6 hrs.); research press coverage of same and calls to press contacts re same (1.0 hrs.).	1.60
	CHM Conference call with client (.5 hrs.); review Weiss memo and other documents (2.0 hrs.); review ATSDR write up (.7 hrs.); review Grace comments to Administrative record and draft summary (2.0 hrs.).	5.20



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		<u>Hours</u>
01/15/02	CHM Conference with P. Goad re Libby issues (.8 hrs.); prepare executive summary of comments (1.2 hrs.); meeting with A. Zacaroli re Libby project (.5 hrs.).	2.50
	ACZ Review Homes/Roberts documents from Libby related to asbestos assessments (.6 hrs.); conference with C. Marraro, P. Goad regarding same (.6 hrs.); telephone discussions with BNA about discrepancies in EPA treatment of WTC site and other sites (.6 hrs.).	1.80
01/17/02	CHM Review asbestos (.6 hrs.); conference with P. Goad re notes (.6 hrs.); review Weiss memo (1.0 hrs.); conference call with P. Goad re same (1.2 hrs.).	2.80
01/18/02	CHM Review articles (.5 hrs.); study P. Goad's analysis of study proposal (.7 hrs.); conference with clients (.2 hrs.).	1.40
	ACZ Review BNA story on WTC threats (.3 hrs.); follow-up calls to P. Najor, reporter with BNA (.4 hrs.).	0.70
01/23/02	ACZ Research/review latest press articles on WTC hazards.	0.30
	CHM Prepare for meeting with EPA (3.8 hrs.); meeting with EPA (2.0 hrs.).	5.80
01/24/02	CHM Conference call with B. Corcoran reporting on EPA meeting (1.0 hrs.); revise March draft report (.6 hrs.); conference with B. Corcoran re same (.4 hrs.); review articles re Libby (.4 hrs.).	2.40
01/25/02	CHM Follow-up call with EPA.	0.50
01/29/02	ACZ Review BNA article on recent EPA statements regarding WTC health risk (.2 hrs.); follow-up calls to BNA and Inside EPA regarding issues (.1 hrs.).	0.30

W. R. Grace &amp; Co.

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	<u>Hours</u>	<u>Amount</u>
01/30/02 CHM Call with EPA (.5 hrs.); follow-up call with client (.2 hrs); conference with P. Goad (.3 hrs.).	1.00	
Total Fees	29.10	\$11,723.00
Balance Due		\$11,723.00

## Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>
Christopher H. Marraro, Partner	24.40	440.00
Alec C. Zacaroli, Associate	4.70	210.00

**MATTER 10 - FEE  
APPLICATION  
FEES - JANUARY 2002**

Wallace  
King  
&  
Marraro  
Branson

WALLACE KING MARRARO & BRANSON, PLLC  
1050 THOMAS JEFFERSON STREET, N.W.  
WASHINGTON, DC 20007

Phone 202.204.1000  
Fax 202.204.1001

February 21, 2002

W. R. Grace & Co.  
Attention: Akos L. Nagy  
7500 Grace Drive  
Columbia, MD 21044

Invoice #12653

For Professional Services Rendered in Connection with Preparation of Fee Application to  
Bankruptcy Court - Matter 10

Professional Services:

	<u>Hours</u>	
01/02/02 CHM Prepare fee application.	2.10	
01/22/02 CHM Review second interim application.	1.20	
		<u>Amount</u>
Total Fees	3.30	\$1,452.00
Balance Due		<u>\$1,452.00</u>

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>
Christopher H. Marraro, Partner	3.30	440.00

**MATTER 11 - GENERAL  
MATTERS (AUDIT LETTER)  
FEES - JANUARY 2002**

Wallace  
King  
&  
Marraro  
Branson

WALLACE KING MARRARO & BRANSON, PLLC  
1050 THOMAS JEFFERSON STREET, N.W.  
WASHINGTON, DC 20007

Phone 202.204.1000

Fax 202.204.1001

February 21, 2002

W. R. Grace & Co.  
Attention: Richard Senfleben  
7500 Grace Drive  
Columbia, MD 21044

Invoice #12654

For Professional Services Rendered in Connection with General Matters - Matter 11

Professional Services:

	<u>Hours</u>	
01/29/02 CHM Begin to prepare audit letter response.	1.00	
01/30/02 CHM Work on audit letter.	1.50	
		<u>Amount</u>
Total Fees	2.50	\$1,100.00
Balance Due		\$1,100.00

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>
Christopher H. Marraro, Partner	2.50	440.00

## **EXHIBIT B**

**EXPENSE SUMMARY**

		EXPENSES
Copies- Internal and Outside		\$1,157.75
Facsimile		\$80.25
Lexis		\$114.18
Telephone		\$324.23
Westlaw		\$264.96
Overtime Transportation		\$319.04
Total		\$2,260.41



**MATTER 6 - HONEYWELL  
EXPENSES - JANUARY 2002**

Wallace  
King  
&  
Marraro  
Branson

WALLACE KING MARRARO & BRANSON, PLLC  
1050 THOMAS JEFFERSON STREET, N.W.  
WASHINGTON, DC 20007

Phone 202.204.1000

Fax 202.204.1001

February 21, 2002

W. R. Grace & Co.  
Attention: Richard Senftleben  
7500 Grace Drive  
Columbia, MD 21044

Invoice #12652

For Professional Services Rendered in Connection with Honeywell, Inc. - Matter 6

Disbursements:

	<u>Amount</u>
Copy Costs - Internal	884.55
Facsimile Costs	60.00
Lexis Costs	114.18
Long Distance Charges	324.23
Outside Copies	250.55
Overtime Transportation	319.04
Westlaw	264.96
 Total Disbursements	 <u>\$2,217.51</u>

**MATTER 9 - LIBBY, MT.  
EXPENSES - JANUARY 2002**

Wallace  
King  
&  
Marraro  
Branson

WALLACE KING MARRARO & BRANSON, PLLC  
1050 THOMAS JEFFERSON STREET, N.W.  
WASHINGTON, DC 20007  
Phone 202.204.1000  
Fax 202.204.1001

February 21, 2002

W. R. Grace & Co.  
Attention: William Corcoran  
Vice President-Public & Regulatory Affairs  
7500 Grace Drive  
Columbia, MD 21044

Invoice #12653

For Professional Services Rendered in Connection with Libby, Montana - Matter 9

Disbursements:

	<u>Amount</u>
Copy Costs - Internal	22.65
Facsimile Costs	20.25
Total Disbursements	<u>\$42.90</u>